

From: [Helen Chaitman](#)
To: [Ozturk, Ferve](#)
Cc: [Markel, Tatiana](#); [Murphy, Keith R.](#); [Beckerlegge, Robertson D.](#)
Subject: RE: Picard v. Donald Benjamin, Adv. Pro. No. 10-04621
Date: Friday, August 12, 2016 2:23:07 PM

We have produced voluminous records on behalf of Mr. Benjamin. The only documents Mr. Benjamin has that have not been produced are his bank records for the period from 2006 – 2008. However, since Mr. Benjamin has acknowledged the accuracy of Exhibit B for the two –year period at issue in the case, the bank records have no relevance. We will be producing an expert affidavit dealing with the taxes he paid and the tax refunds he received. Therefore, the bank records have no relevance to any issues in this case and, of course, they are highly personal and confidential.

Finally, you have served a subpoena on Mr. Benjamin's bank so you will receive the bank's records, even though we believe they are not properly discoverable.

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From: Ozturk, Ferve [mailto:fozturk@bakerlaw.com]
Sent: Friday, August 12, 2016 10:14 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Markel, Tatiana <tmarkel@bakerlaw.com>; Murphy, Keith R. <kmurphy@bakerlaw.com>; Beckerlegge, Robertson D. <rbeckerlegge@bakerlaw.com>
Subject: RE: Picard v. Donald Benjamin, Adv. Pro. No. 10-04621

Dear Ms. Chaitman,

Per my letter sent to you August 2, 2016, I requested that you advise by August 5, 2016 whether you were withholding documents pursuant to your Responses and Objections to the Trustee's written discovery in the above-referenced matter. However, we have not received any response to date. The fact discovery deadline in this matter is today, so please advise at your earliest convenience.

In addition, the Defendant's production in this matter does not include bank documents as requested in the Trustee's requests for production. Please produce such documents or confirm that you are withholding such documents based on your Responses and Objections.

Thanks,
Ferve

From: Suffern, Anne

Sent: Tuesday, August 02, 2016 2:03 PM
To: hchaitman@chaitmanllp.com
Cc: Markel, Tatiana; Murphy, Keith R.; Ozturk, Ferve
Subject: Picard v. Donald Benjamin, Adv. Pro. No. 10-04621

Dear Ms. Chaitman,

Please see attached a letter from Ms. Ozturk concerning the discovery responses in the above noted adversary proceeding.

Thank you,

Anne

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Paralegal



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